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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PHILLIP SULLIVAN, JR.,
on behalf of himself and all others similarly situated,

Plaintiff,

Case No.: 19-CV-719

v.

DOCTOR'S ASSOCIATES LLC,
GEETA FASTFOOD ENTERPRISE INC.,
and ABHIMANUE MANCHANDA,

**PLAINTIFF'S REPLY TO
DEFENDANTS'
COUNTERCLAIM**

Defendants.

Plaintiff, PHILLIP SULLIVAN, JR., on behalf of himself and the Class, by and through his attorneys, LEE LITIGATION GROUP, PLLC, hereby submits his response to the counterclaim presented in Defendants GEETA FASTFOOD ENTERPRISE INC., and ABHIMANUE MANCHANDA's Amended Answer to the Plaintiff's Complaint and Counterclaim for Attorneys Fees and Costs:

AS AND FOR THE FIRST COUNTERCLAIM

Paragraph 97 under the "Counterclaim" subheading asserts legal conclusions to which no reply is required. To the extent a reply is required, Plaintiff denies the allegations set forth in such paragraph.

AFFIRMATIVE DEFENSES

1. Defendants fail to state a claim upon which relief may be granted as Defendants' allegations fail to satisfy the pleading requirements of *Twombly* and *Iqbal*.

2. Defendants' counterclaim is without any legal or factual basis and is intended to harass Plaintiff in retaliation for bringing his wage and hour claims.

3. Defendants' counterclaim is barred because Defendants cite to an inapplicable statute.

4. Defendants' counterclaim is barred because Defendants suffered no damage.

PRAYER FOR RELIEF

Plaintiff denies any and all allegations, statements, and other content of the "Wherefore" clause.

Dated: June 11, 2019

LEE LITIGATION GROUP, PLLC
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By: /s/ C.K. Lee
C.K. Lee, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2019, I electronically filed the foregoing Plaintiff's Reply to Defendants' Counterclaim with the Clerk of the District Court using the CM/ECF system, which sent notification to all parties registered to receive notice via that service, including:

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By: /s/ C.K. Lee
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